

REMARKS

Applicant respectfully requests reconsideration of this application, as amended.

Claims 1-18 are pending. By this Amendment, Claims 1 and 11 have been amended to more particularly recite certain distinctive features of Applicant's invention, as discussed below. Claims 1 and 11 have also been amended to address the alleged informalities therein, and Claim 15 has been amended to correct a minor error in the preamble.

In the Office Action mailed June 26, 2006, Claims 1-18 were rejected under 35 U.S.C. 103 over W. Stallings, 1999, "Cryptography and Network Security, Principles and Practice, 2nd Ed. ("Stallings") in combination with WAP Forum, March 29, 2000, "WAP-195-WAEOverview," ("WAP Forum") and U.S. Patent No. 6,763,247 to Hollstrom et al. ("Hollstrom"). Without acceding to the outstanding rejection, Claims 1 and 11 have been amended to more particularly recite certain distinctive features of Applicant's invention.

In particular, Claim 1 now recites, *inter alia*, selectively recognizing an application request as belonging to one of a first and a second communication protocol, the first communication protocol associated with a first server of the second system and the second communication protocol associated with a second server of the second system, providing the application request recognized as belonging to the first communication protocol to the first server of the second system, providing the application request recognized as belonging to the second communication protocol to the second server of the second system, and converting, using a web server application interface portion of the second server, said application request recognized as belonging to the second communication protocol to the first communication protocol. Support for these features

is provided, for example, at paragraphs [0059] and [0064] and Figures 3 and 4, respectively, of Applicant's disclosure.

Claim 11 now recites, *inter alia*, that the first communication protocol is associated with a first server of the second system and the second communication protocol is associated with a second server of the second system, and the second server includes a web server application interface portion configured to convert an application request belonging to the second communication protocol to the first communication protocol.

It is apparent that the applied prior art does not teach or suggest at least the above features of Claims 1 and 11. For example, Stallings teaches an Internet Protocol (IP) security method between two entities. *See* Stallings, p. 400, section 13.1. WAP Forum teaches a WML script exchange method between client and server. *See* WAP Forum, p. 21, para. 7.5. Hollstrom, for its part, teaches a mobile WAP telephone apparatus configured to control an external utility device such as a fax 30, television 40 or digital camera 50. *See* Hollstrom, col. 2, lines 22-36; Fig. 1. Neither Stallings, WAP Forum, nor Hollstrom appear to teach or suggest selectively recognizing an application request as belonging to one of a first and a second communication protocol, providing the application request recognized as belonging to the first communication protocol to the first server of the second system, providing the application request recognized as belonging to the second communication protocol to the second server of the second system, and converting, using a web server application interface portion of the second server, said application request recognized as belonging to the second communication protocol to the first communication protocol as recited in Claim 1. These references also apparently do not teach or suggest a system architecture in which the first communication

protocol is associated with a first server of the second system and the second communication protocol is associated with a second server of the second system, and the second server includes a web server application interface portion configured to convert an application request belonging to the second communication protocol to the first communication protocol as recited in Claim 11.

In addition to lacking an express teaching or suggestion, it is also apparent that the applied references do not inherently disclose the above discussed limitations of Claims 1 and 11 either. To establish inherency, it must be clear that “the missing descriptive matter is necessarily present in the thing described in the reference.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999) (citations omitted). There is no apparent teaching in Stallings, WAP Forum or Hollstrom that the above-discussed features of Claims 1 and 11 are required or necessarily present therein.

In that the applied prior art fails to teach or suggest the features recited in the independent claims, Applicant respectfully submits that Claims 1 and 11 patentably distinguish therefrom. The remaining claims that depend therefrom are also believed to be patentable for the above reasons as well as for the additional features recited therein.

Therefore, Applicant respectfully submits this application is in condition for allowance. A prompt Notice of Allowance is respectfully requested.


Should the Examiner believe that any further action is necessary to place this application in better form for allowance, the Examiner is invited to contact Applicant's representative at the telephone number listed below.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2147-907642) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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